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June 9, 2022

VIA ELECTRONIC CASE FILING

Honorable Cheryl L. Pollak
Chief Magistrate Judge
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11202

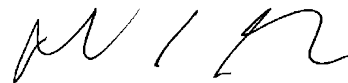
Re: Status Report – Edmondson, et al. vs. Keith Ranieri, et al., No. 1:20-cv-00485

Dear Judge Pollak:

Pursuant to the Court's June 2, 2022 electronic Order, Counsel for Plaintiffs and Counsel for Mr. Chakravorty have reached an agreement regarding the protective order concerning the photographs and affidavit in Mr. Chakravorty's possession and jointly submit a stipulated protective order with this letter. Defendants Clyne, Roberts, and Porter consent to entry of the proposed order. Counsel for Defendants Clare Bronfman and Sara Bronfman have indicated that they have no comments about it.

Additionally, Plaintiffs' Counsel and Mr. Chakravorty's Counsel have agreed that Mr. Chakravorty will produce the above-mentioned discovery materials by Tuesday, June 21, 2022, and respectfully request that the Court enter an Order setting that date as the deadline for production.

Respectfully yours,



Neil L. Glazer

cc: Deborah J. Blum, Esquire (via ECF)
All parties (via ECF)